

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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In re: BAIR HUGGER FORCED AIR  
WARMING DEVICES PRODUCTS  
LIABILITY LITIGATION

MDL No. 15-2666 (JNE/FLN)

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This Document Relates To:  
*All Cases*

**DECLARATION OF GENEVIEVE  
M. ZIMMERMAN IN SUPPORT OF  
PLAINTIFFS' MOTION TO  
EXCLUDE OPINIONS AND  
TESTIMONY OF ALEXANDER A.  
HANNENBERG, M.D.**

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1. My name is Genevieve M. Zimmerman and I am a Partner with the Meshbesh & Spence Ltd. law firm. I am a member of the Court appointed Co-Lead Counsel in the above entitled matter.
  2. Attached hereto as Exhibit A is a true and correct copy of the Expert Report of Alexander A. Hannenberg, M.D.
  3. Attached hereto as Exhibit B is a true and correct copy of Exhibit B to the Expert Report of Alexander A. Hannenberg, M.D. – Materials Considered.
  4. Attached hereto as Exhibit C are true and correct copies of excerpts from the Deposition of Alexander A. Hannenberg, taken on August 8, 2017.
  5. Attached hereto as Exhibit D are true and correct copies of exhibits 1, 2, 6, 8, and 14 to the Deposition of Alexander A. Hannenberg, taken on August 8, 2017.

I declare that the foregoing is true and correct under penalty of perjury pursuant to the laws of the State of Minnesota and the United States of America.

Dated: September 12, 2017

/s/ Genevieve M. Zimmerman

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*Plaintiffs Co-Lead Counsel*